

HONORABLE THOMAS S. ZILLY

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

CHAD EICHENBERGER, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ESPN, INC., a Delaware corporation,

Defendant.

NO. 2:14-CV-00463

STIPULATION REGARDING INITIAL
SCHEDULING DATES

In order to efficiently manage initial pleadings and any motions in response to the Complaint, Plaintiff Chad Eichenberger (“Eichenberger”) and Defendant ESPN, Inc. (“ESPN”) agree and stipulate as follows:

1. ESPN’s deadline to respond to the Complaint, by motion or answer, shall be June 30, 2014.
2. The Rule 26(f) conference, if necessary after the Court’s ruling on any motion to dismiss, shall be held within 14 days of the Court’s order on any such motion.
3. The Initial Disclosures, if necessary after the Court’s ruling on any motion to dismiss, shall be made within 14 days of the Rule 26(f) conference.

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4. The Joint Status Report and Discovery Plan, if necessary after the Court's ruling on any motion to dismiss, shall be filed within 14 days of the Rule 26(f) conference.

5. The deadline for Plaintiff to file a motion for class certification pursuant to LCR 23 shall be stayed pending the entry of a scheduling order by the Court.

By entering into this stipulation, ESPN does not waive any defenses.

Eichenberger and ESPN respectfully request that the Court issue the Proposed Order filed herewith.

DATED this 28th day of May, 2014.

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Certificate of Service

I, Andie C. Scoggins, certify under penalty of perjury of the laws of the State of Washington that on May 28th, 2014, I electronically filed this document entitled STIPULATION REGARDING INITIAL SCHEDULING DATES using the CM/ECF system which will send notification of such filing to the following persons:

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DATED this 28th day of May, 2014, at Seattle, Washington.

/s/ Andie C. Scoggins

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STIPULATION REGARDING INITIAL SCHEDULING
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